

# EXHIBIT M

**Paul A. Woodard**

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**From:** Ken Hiller <khiller@kennethhiller.com>  
**Sent:** Tuesday, October 18, 2016 6:53 PM  
**To:** Paul A. Woodard  
**Cc:** Terrence M. Connors; sandrews@kennethhiller.com  
**Subject:** Wagner v. Ilecki

Dear Mr. Woodard:

At the outset of this case, I questioned your firm's representation of the Ilecki law firm in this case due to your firm's representation of me in a claim made against my firm in the past. In that case, I divulged confidential information to your firm regarding my employees and the practices of my firm.

It has come to my attention that you are seeking to depose, without restriction, Seth Andrews, an attorney employed by my firm. I think very clearly at this point there is a conflict of interest. Confidential information I provided to your firm in the course of your firm's representation of me might be used to aid in your cross-examination of Mr. Andrews.

At this time, your firm is representing a client who has an interest materially adverse to the interests of my firm. I believe at this time there is no question that your firm must withdraw as counsel in this case. Please promptly confirm that you will be filing such a motion.

Kenneth Hiller  
Law Offices of Kenneth Hiller PLLC  
6000 North Bailey Avenue, Ste. 1A  
Amherst, NY 14226  
716-564-3288